SULLIVAN & CROMWELL LLP

TELEPHONE: 1-310-712-6600 1888 Gentury Park East FACSIMILE: 1-310-712-8800 La Angela, California 2000 1725 WWW. PILL COA **USDC SDNY** MEMO ENDORSED DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: March 17, 2014 By Facsimile The Honorable Frank Maas, United States Magistrate Judge, Daniel Patrick Moynihan United States Courthouse Standard Charlese d 500 Pearl Street. Defendants and to file New York, New York 10007. Anwar v. Fairfield Greenwich Ltd., an a proprately redacted No. 09-CV-118 (S.D.N.Y.) - Standard Chartered Cases Verson of he Marle 14 letter. Sullivand Cromwell Should Dear Judge Maas: We write on behalf of the Standard Chartered Defendants ("Standard Chartered") Similarle regarding the Plaintiffs' March 14, 2014 correspondence requesting that the Court strike the expert report of Bradley Ziff. The substantive issues raised in Plaintiffs' letter will be addressed in a coming letter, but we write separately to alert the Court that Plaintiffs' March 14th letter Medicaled

Stipulation and Order Governing Confidentiality of Discovery Material (the "Confidentiality Order") entered by this Court in the Standard Chartered Cases (Dkt. No. 603), and to request that these materials not be made part of the public record.

Under the Confidentiality Order, any discovery materials produced in the Standard Chartered Cases that have been designated as confidential, including "all information 3/7/14" contained in or derived from" such materials, shall not be publicly disclosed. (Dkt. No. 603 at 2-5.) Plaintiffs' March 14th letter attaches two expert reports that have been designated as confidential under the Confidentiality Order through inclusion of the legend "Confidential – SC Cases, SDNY." (Dkt. No. 603 at 3.) Further, Plaintiffs' letter itself discusses "information"

both encloses and refers to materials that have been designated as confidential under the

contained in or derived from" those confidential reports. The contents of Plaintiffs' letter are, therefore, also considered confidential under the Confidentiality Order.

For this reason, Standard Chartered respectfully requests that Plaintiffs' March 14th letter and attachments thereto not be entered onto the public record of these proceedings.

Respectfully submitted,

Diem Miliony/SRG

Diane L. McGimsey

Standard Chartered Plaintiffs' Steering Committee (by e-mail)

CC: